

FOR COST RECOVERIES

ACTION: MODE: D DOCID: BD 0529 07095 USERID: SALT STATUS
 APPRVL: OVER: BATID: ORGID:
 BILLING DOCUMENT INPUT SCREEN
 BATCH DATE: NUM DOCS: NET:
 DOC DATE: 4/2/90 ACCTG PRD: (3 90) ACTION: DOC TYPE:
 TRANS TYPE: BUDGET FYS: APPR:
 ***DOC TOTAL: 454.08 COMMENTS:
 BILL PRINT FLAG: COLLECTION DUE DATE: INTEREST RATE:
 TEXT TYPE: WAIVER FLAG: HP
 PAYOR CODE: SAME AS BILLING
 PAYOR NAME: Ornd Corporation
 ADDRESS: Route 7
 CITY: Hannibal STATE: OH ZIP: 43931-

NOTE: FILL IN SCREEN PER THIS SAMPLE

IFMS LINE SCREEN FOR BD - BILLING DOCUMENT FOR COST RECOVERIES

APPROPRIATION HSCR = 20X8145.4 COST RECOVERIES

*YOU MUST KEY IN ON LINE SCREEN HSCR FOR EACH BD

ACTION: MODE: D DOCID: BD 0529 07095 USERID: SALT STATUS
 APPRVL: OVER: BATID: ORGID:
 01- LINE NO: 001 BFY: 90 * APPR: HSCR TRAN TYPE: 33 ORG: 05 F
 PE: T6B REV SOURCE: TEXT TYPE: **SITE/PROJ: 0512P
 BOC: 454.08 REPT CAT: 29 INTEREST RATE: 7.99% GL ACCT:
 ***AMOUNT: I/D: I DESC: 076645FP13 (FULL 10 DIGIT ACCOUNT NUMBER
 REF DOC - TC: NUMBER: LINE NUM: ADV: TRAV TYPE:
 02- LINE NO: BFY: APPR: TRAN TYPE: ORG:
 PE: REV SOURCE: TEXT TYPE: SITE/PROJ:
 BOC: REPT CAT: INTEREST RATE: GL ACCT:
 AMOUNT: I/D: DESC:
 REF DOC - TC: NUMBER: LINE NUM: ADV: TRAV TYPE:
 03- LINE NO: BFY: APPR: TRAN TYPE: ORG:
 PE: REV SOURCE: TEXT TYPE: SITE/PROJ:
 BOC: REPT CAT: INTEREST RATE: GL ACCT:
 AMOUNT: I/D: DESC:
 REF DOC - TC: NUMBER: LINE NUM: ADV: TRAV TYPE:

A--*CU13-CONTINUING SAME DOCUMENT

**SITE/PROJ IS 5 DIGITS. SITE/PROJ MUST BE FILLED IN FOR EACH BD. THE POSITION 1 & 2= REGION AH
 NUMBER, POSITION 3 & 4= 2 DIGIT SITE IDENTIFIER, AND THE 5TH DIGIT = SUPERFUND ACTIVITY CODE.
THE SITE/PROJ 5 DIGIT CODE IS DERIVED FROM THE 10 DIGIT ACCOUNT NUMBER KEYED IN UNDER DESC.
THAT MUST BE FILLED IN FOR EACH BD.

**HEADER DOCUMENT TOTAL AND LINE AMOUNT MUST BE IDENTICAL.

FILE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

OCT 02 1990

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

p 352 932 701

John D. Reggi
Project Coordinator
Ormet Corporation
Route 7
Hannibal, Ohio 43931

RE: Ormet Site

Dear Mr. Reggi:

On May 24, 1990 the U.S. Environmental Protection Agency (EPA) submitted an accounting of costs incurred at the Ormet site for the period of 4/1/89 thru 3/31/90 and demanded payment of these costs, totalling \$126,144.10. Your correspondence dated June 15, 1990 and August 29, 1990 stated that the "itemized statements" did not constitute an accounting of oversight costs as required by Section XXV of the Consent Order and requested detailed information for contractual costs as provided for previous billings.

Once again, the U.S. EPA disagrees with your assertion that the U.S. EPA itemized bill does not constitute an accounting for these costs. As explained by Rhonda McBride, U.S. EPA Regional Project Manager (RPM) for Ormet, these documents were provided on a one time basis as a matter of courtesy.

Ormet will not be relieved of interest charges as a result of its request for information not required by the consent order and Ormet's delays in making the required payment. The U.S. EPA suggests that Ormet make full payment to prevent further interest charges.

It is U.S. EPA's position that Ormet is past due on its account. Ormet presently owes \$78,450.33 in principal and \$454.08 in interest for the billing period 4/1/89 thru 3/31/90. Interest will continue to accrue until full payment is made.

Thank you for your cooperation.

Sincerely yours,

Ivars P. Antens, Chief
Financial Management Branch

Enclosures

cc: Rhonda McBride, 5HS-11
Susan Swales, 5HSM-TUB-7
Jane Lupton, 5CS-TUB-3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

John Reggi
Project Coordinator
Ormet Corporation
Route 7
Hannibal, Ohio 43931

RE: Ormet, OH

Dear Mr. Reggi:

The enclosed documents indicate that your account remains outstanding and interest of 8.47% per annum, for the period October 1, 1989 to September 30, 1990 and 7.99% per annum, for the period October 1, 1990 to September 30, 1991 will continue to be charged on your balance. In addition, the delinquent debt will be reported to the U.S. Environmental Protection Agency (EPA) Office of Regional Counsel for further action if payment or satisfactory arrangement is not made within 30 days of receipt of this bill.

Account Receivable No. OT095

Billing Date 5/24/90

Original Debt

\$126,144.10

First 59 Days Interest (5/29 thru 7/26)

1,727.06

Balance 7/26/90

\$127,871.16

Additional 42 Days Interest (7/27 thru 9/6)

1,229.44

Balance 9/6/90

\$129 100.60

Less Payment 9/7/90

(50,650.27)

Total Debt 9/7/90

\$78,450.33

Additional 24 Days Interest (9/7 thru 9/30
at 8.47%) On Balance of \$78,450.33.

436.91

Additional 1 Day Interest (10/1 at 7.99%)
On Balance of \$78,450.33

17.17

Balance Due 10/1/90

\$78,904.41

In order to avoid further interest charges, please mail your check or money order immediately, made payable to the EPA Hazardous Substance Superfund and forward your payment to the following address:

U.S. Environmental Protection Agency
Region V
Attention: Superfund Accounting
P.O. Box 70753
Chicago, Illinois 60673

We again caution you that if payment is not received within 30 days of receipt of this bill, information relating to this account will be referred to the EPA's Office of Regional Counsel for further action.

If you have any questions regarding the debt, your inquiry should be directed to Vanessa Simmons at (312) 353-4885 or mailed to the above address.

If payment has been made please disregard this notice.

Thank you for your cooperation.

Sincerely yours,

Ivars P. Antens
Financial Management Officer

Enclosures

cc: Rhonda McBride, 5HS-11
Craig Mankowski, 5HSM-TUB-7
Jane Lupton, 5CS-TUB-3

5MFS-14
M. Hughes
9/26/90

5MFS-14
Manthony
9/28/90

5MFS-14
9/28/90

5MFS
Antens
9/28/90
10/2/90
new 10/2/90 ✓

CORPORATION

P.O. BOX 176 HANNIBAL, OHIO 43931

BUILDING OUR FUTURE TODAY

DATE | REG. NO.

29	90	10191
----	----	-------

Pay Exactly

50,650

Dollars and

27

Cents

NET AMOUNT

*****50,650.27

TO U S ENVIRONMENTAL PROTECTION
THE AGENCY
ORDER
OF

**BANK OF BOSTON
CONNECTICUT
WATERBURY, CONN.**

US EPA Region V
Finance & Accounting
830 South Dearborn Street
Chicago, Illinois 60604
ORDER CD NO. 253
9/7/78

REC'D UNDER CD NO

DATED

AMOUNT

ORMET CORPORATION

Nonresponsive



ORMET CORPORATION
P.O. BOX 176
HANNIBAL, OHIO 43931
(614) 483-1381 Fax: (614) 483-2622

August 29, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dep 9/6

Mr. Ivars P. Antens
Financial Management Office
U.S. Environmental Protection Agency
230 South Dearborn 5MFS-14
Chicago, IL 60604

Dear Mr. Antens:

Re: USEPA Response Costs--Ormet Corporation Site

05-967095
We received on July 31, 1990 your letter, dated July 27, 1990, regarding your response to our request for an accounting of oversight costs as required by Section XXV of the Consent Order. Ormet strongly disagrees with your statement that those portions of the billing which contain lump-sum totals represent an "itemized statement" or an accounting (i.e., the ARCS Contract, the Contract Laboratory Program, the ESAT Contract, the NEIC Contract, the TES Contract, and the Metcalf & Eddy Contract).

For previous billings, Ormet asked for and received detailed information regarding these types of Contracts. This information, which did not include any confidential business information, enabled Ormet to substantiate that the billings represented cost incurred as a result of activities related to the Ormet site. USEPA obviously has these detailed data and your refusal to supply it does not meet the intent or the spirit of Section XXV(B) of the Ormet/USEPA Consent Order.

Ormet has included a partial payment for that oversight cost for which adequate accounting has been received. Those substantial costs for which adequate accounting has not been received and representing more than 60% of the total billing are as follows:

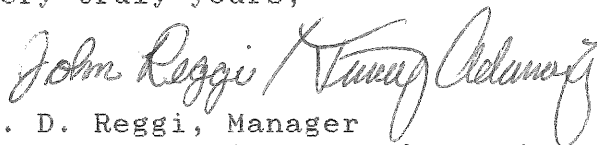
ARCS Contract	
. Donahue & Associates (68-W8-0093)	\$1,023.76
Contract Lab Program	
. CSMRI Analytical Inc. (68-01-7312)	9.22
. EMS Laboratories (68-W8-0043)	1,645.00
. Environmental Science & Engineering (68-01-7316)	136.89
. Langston (68-W8-0042)	450.14
. Northern Labs & Engineering (68-01-7313)	134.40
. Pace Laboratories, Inc. (68-W8-0019)	1,181.81
. Post Buckley Schuh & Jernigan (68-01-7323)	8.73

ESAT Contract	
. Rory F. Western Inc. (68-01-7443)	1,184.65
NEIC Contract	
. Techlaw - Contract Evidence Audit Team (68-01-7369)	2.83
Other Contract	
. Metcalf & Eddy (68-W9-0007)	6,406.76
TES Contract	
. Jacobs Engineering (68-01-7351)	<u>65,036.70</u>
Total	<u>\$77,220.89</u>

Enclosed is a check for \$50,650.27 representing that portion of the total billing for which Ormet has received an accounting.

Ormet respectively requests an accounting of those billings listed above similar in detail to that received for the previous billings.

Very truly yours,


J. D. Reggi, Manager
Corporate Environmental Services

JDR:jg
Enclosure

cc: Rhonda McBride	5HS-11
Jane Lupton	5CS-TUB-3
Susan Swales	5HSM-TUB-7
J. W. Ubinger, Esq.	

ACTION: MODE: D DOCID: BD AF05290T095 USERID: EPA5 STATUS
APPRVL: OVER: BATID: ORGID:

BILLING DOCUMENT INPUT SCREEN

B- BATCH DATE: NUM DOCS: NET:
H- DOC DATE: 05 24 90 ACCTG PRD: ACTION: DOC TYPE:
TRANS TYPE: 33 BUDGET FYS: APPR:
DOC TOTAL: 126,144.10 COMMENTS:
BILL PRINT FLAG: COLLECTION DUE DATE: INTEREST RATE: 8.47%
TEXT TYPE: WAIVER FLAG:
PAYOR CODE: MISC 05
PAYOR NAME: ORMET CORPORATION
ADDRESS: P. O. Box 17
CITY: HANNIBAL STATE: OH ZIP: -3931--

01-
LINE NO: 001 BFY: 90 APPR: HSCR TRAN TYPE: 33 ORG: 05F
FE: TGB REV SOURCE: TEXT TYPE: SITE/PROJ: 0512P
BOC: REPT CAT: 29 INTEREST RATE: 8.47% GL ACCT:
AMOUNT: 126,144.10 I/D: I DESC: OTGB05FP1Z
REF DOC - TC: NUMBER: LINE NUM: ADV: TRAV TYPE:

02-
LINE NO: BFY: APPR: TRAN TYPE: ORG:
FE: REV SOURCE: TEXT TYPE: SITE/PROJ:
BOC: REPT CAT: INTEREST RATE: GL ACCT:
AMOUNT: I/D: DESC:
REF DOC - TC: NUMBER: LINE NUM: ADV: TRAV TYPE:

03-
LINE NO: BFY: APPR: TRAN TYPE: ORG:
FE: REV SOURCE: TEXT TYPE: SITE/PROJ:
BOC: REPT CAT: INTEREST RATE: GL ACCT:
AMOUNT: I/D: DESC:
REF DOC - TC: NUMBER: LINE NUM: ADV: TRAV TYPE:

A---*CU13 CONTINUING SAME DOCUMENT

AB

5-29-98



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

P.433 153827

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAY 24 1990

John D. Reggi
Project Coordinator
Ormet Corporation
Route 7
P.O. Box 17
Hannibal, Ohio 43931

DTG 05FPIZ
HSCR
OH

RE: Ormet Site

Dear Mr Reggi:

The enclosed billing is for the recovery of costs incurred by the U.S. Environmental Protection Agency (EPA) for response activity, performed under the authority of the Comprehensive Environmental Response Compensation and Liability Act as Amended for the period of 4/1/89 thru 3/31/90. These costs were incurred for the Ormet site, EPA is due \$126,144.10. This bill is solely for recovery of government oversight costs, any fines and/or civil penalties due will be billed separately.

This billing invoice is being forwarded to you for payment based on the enclosed consent order. Please make your check payable to EPA Hazardous Substance Superfund and forward your payment to:

EPA Region V
Attention: Superfund Accounting
P.O. Box 70753
Chicago, IL 60673

To avoid additional charges, payment must be received within 30 days of receipt of this bill. If not received, interest will accrue, from the receipt date at the rate of 8.47% from October 1, 1989 to September 31, 1990. If there are any questions please contact V. Simmons at (312) 353-4885.

To ensure that your payment is properly recorded by EPA for the period of 4/1/89 thru 3/31/90, the following information must be included on the face of your payment check:

Ormet, OH
Account No. 0T095
Site No. 1Z

Any questions or problems regarding this billing should be directed to:

U.S. Environmental Protection Agency
ATTN: Vanessa Simmons
230 South Dearborn 5MFS-14
Chicago, Illinois 60604

Thank you for your cooperation

Enclosures

Sincerely yours,

Ivars P. Antens
Financial Management Officer

cc: Rhonda E. McBride, 5HS-11
Susan Swales, 5HSM-TUB-7
Jane Lupton, 5CS-TUB-3

5MFS-14
4/20/90
5MFS-11
4/20/90
5MFS-11
4/23/90
5MP
4/24/90
KEN
5/8/90



CORPORATION

P.O. BOX 176 HANNIBAL, OHIO 43931

BUILDING OUR FUTURE TODAY

1-12460

51-80
111

DATE			REG. NO.
1	01	09	12460

Pay Exactly

*****78,904 Dollars and

41

Cents

NET AMOUNT	
*****78,904.41	

TO
THE
ORDER
OF

U.S. ENVIRONMENTAL PROTECTION AGENCY

BANK OF BOSTON
CONNECTICUT
WATERBURY, CONN.

ORMET CORPORATION

[Signature]
M. J. [unclear]

Nonresponsive

Deposited
07095
Accounting
230 South Dearborn Street
Chicago, Illinois 60604
REC'D UNDER CD NO. 4898
DATED 1/9/80
AMOUNT 78,904.41



ORMET CORPORATION
P.O. BOX 176
HANNIBAL, OHIO 43931
(614) 483-1381 Fax: (614) 483-2622

November 6, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ivars P. Antens
Financial Management Officer
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Antens:

Enclosed is our check #12460, in the amount of \$78,904.41, for EPA contractor oversite costs reflected in your letter of October 6, 1990. As you may be aware, Ormet is entitled to an accounting of all oversite costs pursuant to Section XXV, paragraph B, of the Consent Order. Under Generally Accepted Accounting Principles, Ormet is entitled to details of the character, quantity, price and other particulars of services rendered. No such accounting has been provided. Our Company has limited capital resources, and it is essential that we have an understanding of what the oversite costs incurred by the government involve.

During my most recent phone conversation with Rhonda McBride, Ormet Site Regional Project Manager, Ms. McBride was very cooperative in her effort to work through EPA's documentation to determine the bases for the request for reimbursement. Unfortunately, on several of the contractor costs, she was unable to determine how the totals were derived or identify the work to which these sums relate. In fact, some of these items apparently relate to work performed in 1987 or 1988, and Ormet has absolutely no idea what work was involved. Accordingly, Ormet is making this payment as a gesture of good faith, but under protest with full reservation of Ormet's rights to an accounting as provided in the Consent Order.

While Ormet understands that there may be some difficulties in putting together the information, we are greatly troubled by the failure to properly account for oversite costs as required by the Consent Order. As the party responsible for paying these costs, Ormet has a fundamental right to know what we are paying for.

Mr. Ivars P. Antens

-2-

November 6, 1990

Therefore, it is imperative that these accounting problems be resolved before the next scheduled billing. Ormet's interest is not in generating paperwork for the Agency but is founded upon the very practical need to understand the nature of the requested reimbursement. Accordingly, consistent with our previous offers, Ormet remains willing to come to the Agency's office, at Company expense, to review pertinent documents. While this would fall short of the strict requirements of the Consent Order, it would at least provide Ormet with the fundamental information required. We hope to work with the Agency over the next few months to resolve these problems.

Very truly yours,



J. D. Reggi, Manager
Corporate Environmental Services

JDR:jg
Enclosure

cc: Rhonda McBride, 5HS-11
Susan Swales, 5HSM-TUB-7
Jane Lupton, 5CS-TUB-3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: April 19, 1990

SUBJECT: Superfund Site No. 12
Ormet Corp, OH
Annotated SPUR Request

FROM: Richard D. Hackley, Team Leader
Management Support Unit
Superfund Accounting Section

THROUGH: Anthony Audia, Chief
Superfund Accounting Section
Financial Management Branch

TO: Lynn Peterson, Acting Chief
Solid Waste & Emergency Response Branch

Susan Swales,
Acting Regional Cost Recovery Coordinator
Superfund Program Management Branch

The attached Cumulative Cost Summary outlines all of the cumulative cost expenditures in the Integrated Financial Management System for the Ormet Corporation, OH site.

Also attached are computer reports which list all the obligations and disbursements in the Integrated Financial Management System. One report shows all the hours charged to the site by Region V and Headquarters' personnel, and the salary costs associated with those hours.

We have computed and included for your information Region V's indirect costs. Based on adjustments recommended by the office of inspector General's Superfund audit for Fiscal Years 83 through 86, final indirect cost rates will be \$71.00 (FY83) \$61.00 (FY84), \$53.00 (FY85), and \$51.00 (FY86), respectively. FY87, FY88, FY89 and FY90 will also be computed at the \$53.00 rate until a final audit for those years is completed and a indirect cost recommendation has been made. The computation is included on an additional cumulative payroll report.

OBJECT CLASS LIST

OBJECT CLASS	DEFINITION
21.11	Per Diem & Subsistence while on Travel.
21.13	Common Carrier.
21.14	Privately Owned Vehicle.
21.15	Commercial Rental Vehicle.
21.17	Incidental Costs.
22.09	Other Transportation - Other expenses such as parcel post, contractual charges for the transportation and care to things.
	Management & Support Contracts - Contracts for management Support, or administrative requirements not otherwise classified.
25.35	Program Contracts - Planned dollars for contracts which support program operations. Included in this category are contracts for monitoring, for surveillance and analysis, for Regional laboratory analysis and analysis of programs.
25.70	Interagency Agreements - Contracts and agreements with other Government Agencies.
25.76	Site Supervision & Development Interagency Agreements - Agreements for the purpose of construction monitoring, investigating, studying and cleaning up hazardous waste sites or emergency response on spills.
31.06	Protective Equipment and Clothing - Personal.
31.80	Other Equipment valued at more than \$500.
31.90	Other Equipment valued at less than \$500.
41.83	Investigations, Surveys, or Studies Awards to governmental or non-governmental or individuals for investigations, surveys, or studies of solid waste pollution.
41.85	Superfund Remedial Planning & Implementation Awards to organization or individuals for remedial planning or disposal for hazardous materials.

The third report lists all of the non-payroll and indirect cost expenses related to the site, i.e., travel, shipping purchases, state assistance agreement, Interagency Agreement and contractor costs. The reports are current through April 17, 1990. We have also attached a listing that gives definitions of the various object class codes that may appear on the reports.

If you have any questions or require any additional assistance, please contact Richard Hackley at 3-8838.

Attachments

FOR COST RECOVERIES

ACTION: MODE: D DOCID: BD 052907095 USERID: SALT STATUS
 APPRVL: OVER: BATID: ORGID:
 BILLING DOCUMENT INPUT SCREEN
 3- BATCH DATE: NUM DOCS: NET:
 4- DOC DATE: July 27, 1990 ACCTG PRD: ACTION: DOC TYPE:
 TRANS TYPE: BUDGET FYS: APPR:
 ***DOC TOTAL: 127,871.16 COMMENTS:
 BILL PRINT FLAG: COLLECTION DUE DATE: INTEREST RATE:
 TEXT TYPE: WAIVER FLAG: HP
 PAYOR CODE: SAME AS BILLING
 PAYOR NAME: Ormet Corporation
 ADDRESS: Route 7
 CITY: Hannibal STATE: OH ZIP: 4393

NOTE: FILL IN SCREEN PER THIS SAMPLE

IFMS LINE SCREEN FOR BD - BILLING DOCUMENT FOR COST RECOVERIES

APPROPRIATION HSCR = 20X8145.4 COST RECOVERIES

*YOU MUST KEY IN ON LINE SCREEN HSCR FOR EACH BD

ACTION: 8/26/90 MODE: D DOCID: BD 052907095 USERID: SALT STATUS
 APPRVL: OVER: BATID: ORGID:
 01- LINE NO: 001 BFY: 90 * APPR: HSCR TRAN TYPE: 33 ORG: 05P
 PE: T6B REV SOURCE: TEXT TYPE: **SITE/PROJ: 0512P
 BOC: REPT CAT: 29 INTEREST RATE: GL ACCT:
 ***AMOUNT: 1727.06 I/D: DESC: 076305FP12 (FULL 10 DIGIT ACCOUNT NUMBER
 REF DOC - TC: NUMBER: LINE NUM: ADV: TRAV TYPE:
 02- LINE NO: BFY: APPR: TRAN TYPE: ORG:
 PE: REV SOURCE: TEXT TYPE: SITE/PROJ:
 BOC: REPT CAT: INTEREST RATE: GL ACCT:
 AMOUNT: I/D: DESC:
 REF DOC - TC: NUMBER: LINE NUM: ADV: TRAV TYPE:
 03- LINE NO: BFY: APPR: TRAN TYPE: ORG:
 PE: REV SOURCE: TEXT TYPE: SITE/PROJ:
 BOC: REPT CAT: INTEREST RATE: GL ACCT:
 AMOUNT: I/D: DESC:
 REF DOC - TC: NUMBER: LINE NUM: ADV: TRAV TYPE:

A--*CU13-CONTINUING SAME DOCUMENT

**SITE/PROJ IS 5 DIGITS. SITE/PROJ MUST BE FILLED IN FOR EACH BD. THE POSITION 1 & 2= REGION AH
 NUMBER, POSITION 3 & 4= 2 DIGIT SITE IDENTIFIER, AND THE 5TH DIGIT = SUPERFUND ACTIVITY CODE.
THE SITE/PROJ 5 DIGIT CODE IS DERIVED FROM THE 10 DIGIT ACCOUNT NUMBER KEYED IN UNDER DESC.
THAT MUST BE FILLED IN FOR EACH BD.

***HEADER DOCUMENT TOTAL AND LINE AMOUNT MUST BE IDENTICAL.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

JUL 27 1990

REPLY TO THE ATTENTION OF:

P 433 154 071

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John D. Reggi
Project Coordinator
Ormet Corporation
Route 7
Hannibal, Ohio 43931

RE: Ormet Site

Dear Mr. Reggi:

On May 24, 1990 the U.S. Environmental Protection Agency (EPA) submitted an accounting of costs incurred at the Ormet site for the period of 4/1/89 thru 3/31/90 and demanded payment of these costs, totalling \$126,144.10. In your letter dated June 15, 1990, you stated that the "itemized statements" do not constitute an accounting of oversight costs as required by Section XXV of the Consent Order.

The U.S. EPA strongly disagrees with your assertion that the U.S. EPA itemized bill does not constitute an accounting for these costs. Section XXV(B) of the Ormet Corporation Consent Order states that you are to receive an "accounting" "of all oversight costs incurred by the U.S. EPA." U.S. EPA defines an "accounting" to be an itemized billing, which is what you were provided with. In addition, the U.S. EPA does not receive the level of detail you have requested regarding these costs. Moreover, as you are aware, much of the information that you have requested constitutes Confidential Business Information.

It is U.S. EPA's position that the full amount of the bill; (\$127,871.16), with interest is due and payable within 60 days of receipt of this letter. In addition, the U.S. EPA reserves its rights to undertake appropriate action to insure collection of all amounts owed to the U.S. EPA.

Thank you for your cooperation.

Sincerely yours,

Ivars P. Antens, Chief
Financial Management Branch

Enclosures

cc: Rhonda McBride, 5HS-11
Susan Swales, 5HSM-TUB-7
Jane Lupton, 5CS-TUB-3

[Signature]
SMFS-14
7/24/90

[Signature]
SMFS-14
7/25/90

[Signature]
SMFS-14
7/26/90

[Signature]
SMFS-14
7/27/90

[Signature]
7/27/90

[Signature]
SMF
Antens
7/27/90



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

John Reggi
Project Coordinator
Ormet Corporation
Route 7
P.O. Box 17
Hannibal, Ohio 43931

RE: Ormet Site

Dear Mr. Reggi:

The enclosed document indicates that your account has been outstanding for over 30 days. Your account is now considered delinquent and interest at the rate of 8.47% per annum is being assessed for each day beginning with the date of receipt of this bill.

A summary of your account as of 7/26/90 is as follows:

Original Debt	<u>\$126,144.10</u>
First 59 Days Interest	<u>1,727.06</u>
Total Debt	<u>\$127,871.16</u>

In order to avoid further interest charges, please mail your check or money order immediately, made payable to the U.S. Environmental Protection Agency, to the following address:

U.S. EPA Region V
Attention: Superfund Accounting
P.O. Box 70753
Chicago, Illinois 60673

If payment is not received within 60 days of receipt of this letter, information relating to this account will be referred to EPAs' Office of Regional Counsel for further action.

If you have any questions regarding the debt, your inquiry should be directed to Vanessa Simmons at (312) 353-4885 or mailed to the above address. If not informed otherwise within 30 days of this letter, we will assume you concur with the amount of this bill.

If payment has been made please disregard this notice.

Thank you for your cooperation.

Sincerely yours,

Ivars P. Antens
Financial Management Officer

Enclosures

cc: Rhonda McBride, 5HS-11
Susan Swales, 5HSM-TUB-7
Jane Lupton, 5CS-TUB-3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

P-433 153827

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAY 24 1990

John D. Reggi
Project Coordinator
Ormet Corporation
Route 7
P.O. Box 17
Hannibal, Ohio 43931

RE: Ormet Site

Dear Mr Reggi:

The enclosed billing is for the recovery of costs incurred by the U.S. Environmental Protection Agency (EPA) for response activity, performed under the authority of the Comprehensive Environmental Response Compensation and Liability Act as Amended for the period of 4/1/89 thru 3/31/90. These costs were incurred for the Ormet site, EPA is due \$126,144.10. This bill is solely for recovery of government oversight costs, any fines and/or civil penalties due will be billed separately.

This billing invoice is being forwarded to you for payment based on the enclosed consent order. Please make your check payable to EPA Hazardous Substance Superfund and forward your payment to:

EPA Region V
Attention: Superfund Accounting
P.O. Box 70753
Chicago, IL 60673

To avoid additional charges, payment must be received within 30 days of receipt of this bill. If not received, interest will accrue, from the receipt date at the rate of 8.47% from October 1, 1989 to September 31, 1990. If there are any questions please contact V. Simmons at (312) 353-4885.

To ensure that your payment is properly recorded by EPA for the period of 4/1/89 thru 3/31/90, the following information must be included on the face of your payment check:

Ormet, OH
Account No. 0T095
Site No. 12

Any questions or problems regarding this billing should be directed to:

U.S. Environmental Protection Agency
ATTN: Vanessa Simmons
230 South Dearborn 5MFS-14
Chicago, Illinois 60604

Thank you for your cooperation

Enclosures

Sincerely yours,

Ivars P. Antens
Financial Management Officer

cc: Rhonda E. McBride, 5HS-11
Susan Swales, 5HSM-TUB-7
Jane Lupton, 5CS-TUB-3

5MFS-14
4/20/90
5MFS-14
4/20/90
5MFS-14
4/23/90
5MP
Antens
4/24/90
REN
5/8/90



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

P.433 153827

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

MAY 24 1990

John D. Reggi
Project Coordinator
Ormet Corporation
Route 7
P.O. Box 17
Hannibal, Ohio 43931

12

RE: Ormet Site

Dear Mr Reggi:

The enclosed billing is for the recovery of costs incurred by the U.S. Environmental Protection Agency (EPA) for response activity, performed under the authority of the Comprehensive Environmental Response Compensation and Liability Act as Amended for the period of 4/1/89 thru 3/31/90. These costs were incurred for the Ormet site, EPA is due \$126,144.10. This bill is solely for recovery of government oversight costs, any fines and/or civil penalties due will be billed separately.

This billing invoice is being forwarded to you for payment based on the enclosed consent order. Please make your check payable to EPA Hazardous Substance Superfund and forward your payment to:

EPA Region V
Attention: Superfund Accounting
P.O. Box 70753
Chicago, IL 60673

To avoid additional charges, payment must be received within 30 days of receipt of this bill. If not received, interest will accrue, from the receipt date at the rate of 8.47% from October 1, 1989 to September 31, 1990. If there are any questions please contact V. Simmons at (312) 353-4885.

To ensure that your payment is properly recorded by EPA for the period of 4/1/89 thru 3/31/90, the following information must be included on the face of your payment check:

Ormet, OH
Account No. OT095
Site No. 12

Any questions or problems regarding this billing should be directed to:

U.S. Environmental Protection Agency
ATTN: Vanessa Simmons
230 South Dearborn 5MFS-14
Chicago, Illinois 60604

Thank you for your cooperation

Enclosures

Sincerely yours,

Ivars P. Antens
Financial Management Officer

cc: Rhonda E. McBride, 5HS-11
Susan Swales, 5HSM-TUB-7
Jane Lupton, 5CS-TUB-3

5MFS-14
4/20/90
5MFS-11
4/20/90
5MFS-11
4/23/90
5MP
Antens
4/24/90
REN
5/8/90